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8 UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF WASHINGTON

10 UNITED STATES OF AMERICA,)
11)
12 Plaintiff,) 2:23-CR-46-MKD-1
13)
14 v.)
15) SENTENCING MEMORANDUM
16 EDWARD JAMES SALVADOR,)
17)
18 Defendant.)
19

18 Plaintiff, United States of America, by and through, Vanessa R. Waldref,
19 United States Attorney for the Eastern District of Washington, and Caitlin Baunsgard,
20 Assistant United States Attorney for the Eastern District of Washington, submits the
21 following Sentencing Memorandum.
22

23 **A. PRE-SENTENCE INVESTIGATION REPORT:**
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25 The United States has no formal objections to the pre-sentence investigation
26 report (ECF. 325, 326). As noted in the Plea Agreement and the PSIR, the parties
27 agreed to recommend a 2-level leader / organizer enhancement. The PSIR
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1 recommends a 4-level enhancement; however, this does not change the Defendant's
2 advisory guideline range, 360 months to life. *See* PSIR at p. 26 ¶¶ 167, 172.

3 **B. SENTENCING RECOMMENDATION:**

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5 Based on the totality of the circumstances, the United States is recommending a
6 300-month term of incarceration with a 5-year term of supervised release to follow.
7 The United States respectfully submits such a sentence would be sufficient but not
8 greater than necessary to accomplish the goals of sentencing and achieve an
9 appropriate balance of the 18 U.S.C. § 3553(a) factors.
10

11 The Defendant is no stranger to the criminal justice system, having amassed
12 criminal history stemming over the last 20-ish years, ranging from assault,
13 obstruction, identity theft to attempt to elude, and drug trafficking. The Defendant has
14 been before countless judges surely promising various things. Despite all these
15 chances for change, the Defendant is before the Court to answer for leading nothing
16 less than organized crime from Wenatchee to Moses Lake. The Defendant did so by
17 involving gang affiliations, firearms, and acts of violence. The Defendant's conduct,
18 set against the backdrop of his terrible criminal history, compels the imposition of a
19 significant sentence to protect the community from the Defendant's continuous
20 criminal activities.
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25 Review of the PSIR shows the Defendant had an unstable childhood to include
26 food and housing insecurity, with parents suffering from various addictions and
27 mental health challenges as well as periods of incarceration in California. The
28

1 structure and family orientation of gang life was unquestionably appealing and
2 certainly his associations in that regard propelled his involvement in criminal
3 activities. Mental health and substance abuse services are surely needed upon the
4 Defendant's release from custody.
5

6 Unfortunately, despite stepping back from that lifestyle and those negative
7 associations, the Defendant returned to criminal conduct, and did so in an epic fashion
8 as outlined by the facts of this case. Accordingly, the United States is recommending
9 an extensive period of incarceration for the Defendant.
10

11 DATED this 3rd day of January 2024.
12

13 Vanessa R. Waldref
14 United States Attorney

15 s/ Caitlin Baunsgard
16 Caitlin Baunsgard
17 Assistant United States Attorney

18 **CERTIFICATE OF SERVICE**

19 I hereby certify that on January 3, 2024, I electronically filed the foregoing with
20 the Clerk of the Court using the CM/ECF system, and will email notification of such
21 filing to the following:
22

23 Dave Partovi
24

25 s/ Caitlin Baunsgard
26 Caitlin Baunsgard
27 Assistant United States Attorney
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